

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

OUSMANE BAH,

Plaintiff,

-against-

APPLE INC.,  
SECURITY INDUSTRY SPECIALISTS, INC.,  
STEVEN YHAP, Individually and as an  
Employee of Security Industry Specialists, Inc.,  
JOHN WOODRUFF, Individually and as an  
Employee of Security Industry Specialists, Inc.,  
DETECTIVE PAUL SIEMON, Individually and  
as an Officer of the Paramus Police Department,  
LIEUTENANT ROBERT OLIVE, Individually  
and as an Officer of the Paramus Police  
Department, and  
THE BOROUGH OF PARAMUS,

Defendants.

Case No. 2:20-cv-15018-  
MCA-MAH

**NOTICE OF MOTION FOR  
RULE 11 SANCTIONS**

**Return Date: July 19, 2021**

**DEFENDANTS, SECURITY INDUSTRY SPECIALISTS, STEVEN YHAP  
and JOHN WOODRUFF, MOTION FOR SANCTIONS PURSUANT TO  
RULE 11(c)(2)**

PLEASE TAKE NOTICE that upon the accompanying Memoranda of Law;  
the June 14, 2021 Declaration of David L. Metzger in Support of defendants',  
SECURITY INDUSTRY SPECIALISTS, INC. ("SIS"), STEVEN YHAP  
("YHAP") and JOHN WOODRUFF, Motion for Sanctions pursuant to Federal Rule  
of Civil Procedure Rules 11(c)(2) and the exhibits submitted in connection  
therewith, the Defendants, SIS, YHAP and WOODRUFF, will move this Court, on

July 16, 2021, at the United States District Court for the District of New Jersey in a matter assigned to The Hon. Madeline Cox Arleo, Martin Luther King Boulevard and U.S. Courthouse, 50 Walnut Street, Room 4015, Newark, NJ 07101, Courtroom MLK4A, for an Order, pursuant to Federal Rules of Civil Procedure 11(c)(2), imposing sanctions upon the plaintiff and/or his attorneys for filing a First Amended Complaint in violation of Rule 11(b).

Opposition briefs are to be filed by July 6, 2021. Reply briefs are to be filed by July 12, 2021.

Dated: June 14, 2021

David Metzger

David L. Metzger, Esq.  
LEWIS JOHS AVALLONE AVILES, LLP  
Attorneys for Defendants  
SECURITY INDUSTRY SPECIALISTS,  
INC., STEVEN YHAP and  
JOHN WOODRUFF  
61 Broadway, Suite 2000  
New York, New York 10006  
212.233.7195  
[dlmetzger@lewisjohs.com](mailto:dlmetzger@lewisjohs.com)

To:

*To all parties via e-mail and ecf*